

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

DREAM COLLECTIVE, INC., a California corporation;

Plaintiff,

vs.

MADEWELL, INC, a Delaware corporation;
J. CREW, INC., a Delaware corporation; J.
CREW GROUP, INC., a Delaware corporation;
MAURICE MAX, INC. D/B/A LEE ANGEL., a New York Corporation; and
DOES 1 through 10, inclusive,

Defendants.

Case No. 2:15-cv-07871

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT BY
NOT MORE THAN 30 DAYS (L.R. 8-3)**

Complaint served: October 24, 2015
Original response date: November 14, 2015
Current response date: December 9, 2015
New response date: December 14, 2015

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys for DREAM COLLECTIVE, INC., (“Plaintiff”) and MADEWELL, INC., J. CREW, INC., J. CREW GROUP, INC. and MAURICE MAX, INC. D/B/A LEE ANGEL (“Defendants”) that the deadline for Defendants to answer or otherwise respond to Plaintiff’s Complaint dated October 7th, 2015 is extended through to December 14th, 2015

IT IS FURTHER STIPULATED AND AGREED that Defendants hereby waive all defenses relating to personal jurisdiction, including, without limitation, in connection with defects in service, subject matter jurisdiction and venue and agrees not to make any motion to dismiss or contest this action on the basis of any such waived defense.

IT IS FURTHER STIPULATED AND AGREED by and between the undersigned attorneys for Plaintiff and Defendants that PDF and facsimile signatures shall be deemed original signatures for all purposes under this Stipulation.

Dated: December 8, 2015
Los Angeles, California

Dated: December 8, 2015
New York, New York

ERIKSON LAW GROUP
Attorneys for Plaintiff

LAZARUS & LAZARUS, P.C.
Attorneys for Defendant Maurice Max, Inc.

By: /s/ David Erikson
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1 Dated: December 8, 2015
2 New York, New York

3 **COWAN LIEBOWITZ & LATMAN, P.C.**

4 *Attorneys for Defendant Madewell, Inc.,
5 J. Crew, Inc. and J. Crew Group, Inc.*

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